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<div align="center">REMARKS</div>

I.   Introduction

In response to the Office Action dated April 20, 2006, claims 1, 2, 5, 9, 10, 13, 16, 17, 18, and 20 have been amended. Claims 6-8, 14-15, and 21-23 have been withdrawn. Claims 1-5, 9-13, and 16-20 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II.   Non-Art Rejections

In paragraph (3) of the Office Action, claims 18-19 were objected to for various informalities.

Applicant has amended claim 18 and submits that the objections are now moot.

III.   Prior Art Rejections

In paragraphs (4)-(9) of the Office Action, claims 1-3, 9-11, and 16-18 were rejected under 35 U.S.C. §102(e) as being anticipated by Peckham (US 2004/0068503).

In paragraphs (10)-(13) of the Office Action, claims 4-5, 12-13, and 19-20 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of Peckham in view of Rawlings (US 5,652,865).

Specifically, independent claims 1 and 16 were rejected as follows:

> 6. With respect to claims 1 and 16, Peckham discloses a method for managing memory and an article of manufacture comprising a program storage medium readable by a computer and embodying one or more instructions executable by the computer to perform a method for managing memory, the method comprising:
> - breaking up a file into two or more memory blocks [0004, lines 1-2, each memory block is a 256-MB region; 0047, lines 1-4; AIX operating system used to manage blocks];
> - managing the two or more memory blocks as nodes in a heap tree (Figs. 4A-4D) [0004, lines 2-8; 0031 -0033; 0041 -0042; the 256-MB regions are nodes pointed to by regional control blocks] wherein each node has a heap block reference ("Pointer to Data Structures", 31 0 of Figs. 3A and 3B) [0004, lines 2-8; 0029, lines 5-9; 0038, lines 2-51;
> - receiving a request to access memory at a linear file address [0028-00291; and
> - translating the linear file address to an appropriate heap block reference to access the memory block [0004, lines 2-8; 0029, lines 5-9; 0038, lines 2-51.

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Applicant traverses the above rejections for one or more of the following reasons:

(1)   Peckham fails to teach, disclose or suggest the independent compression of individual blocks in a file; and

(2)   Peckham fails to teach, disclose or suggest the independent compression of blocks in a file without reprocessing an entire file.

Independent claims 1, 9, and 16 are generally directed to managing memory as a heap. More specifically, a file is broken up into multiple memory blocks. The blocks are then managed as nodes in a heap tree. As amended, the claims now provide that individual memory blocks are independently compressed. Paragraphs [0039] and [0040] of the specification as filed clearly describe such compression and the advantages:

> [0039]   Utilizing the heap 400 to represent a file system also provides additional advantages. For example, one may compress or encrypt (or both) 414 the logical user data prior to saving to the heap 400. Prior art file systems implement compression and encryption by compressing or encrypting an entire file. To access an encrypted file, the entire file is first completely uncompressed or unencrypted and saved to a temporary file. Operations are then performed on the temporary file. When the file is closed, the entire file is recompressed or reencrypted.

> [0040]   By using the heap 400, only the block(s) that contain the physical data that is modified need to be recompressed or reencrypted 414. Accordingly, each block may be independently compressed and decompressed (rather than the entire file). Modified data most likely compresses or encrypts to a new size. In response, the heap 400 may allocate or reuse a block of the appropriate size for the modified data without reprocessing the entire file.

As can be seen, in the prior art, an entire file must be compressed or encrypted. However, the present invention, as set forth in the claims, advantageously compressed only certain memory blocks. Further, such memory blocks are compressed independently from each other. In addition, the entire file does not need to be reprocessed as in the prior art.

Peckham completely fails to describe, explicitly or implicitly, the compression of any memory blocks whatsoever. In this regard, an electronic search of Peckham for the term "compress" provides no results whatsoever. Without even mentioning the term "compress", Peckham cannot possibly teach, disclose, or suggest the independent compression of different memory blocks in a file. In addition, the other cited references also fail to cure Peckham's deficiencies.

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Moreover, the various elements of Applicant's claimed invention together provide operational advantages over the cited references. In addition, Applicant's invention solves problems not recognized by the cited references.

Thus, Applicant submits that independent claims 1, 9, and 16 are allowable over Peckham and Rawlings. Further, dependent claims 2-5, 10-13, and 17-20 are submitted to be allowable over Peckham and Rawlings in the same manner, because they are dependent on independent claims 1, 9, and 16, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-5, 10-13, and 17-20 recite additional novel elements not shown by Peckham and Rawlings.

IV.   Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicant's undersigned attorney.

Respectfully submitted,

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